

In re:  
2nd Chance Investment Group, LLC  
NBCUniversal LLC  
Debtors

Case No. 22-12142-SC  
Chapter 11

District/off: 0973-8  
Date Rcvd: Mar 10, 2025

User: admin  
Form ID: pdf042

Page 1 of 4  
Total Noticed: 1

The following symbols are used throughout this certificate:

Symbol	Definition
+	Addresses marked '+' were corrected by inserting the ZIP, adding the last four digits to complete the zip +4, or replacing an incorrect ZIP. USPS regulations require that automation-compatible mail display the correct ZIP.

**Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Mar 12, 2025:**

Recip ID	Recipient Name and Address
db	+ 2nd Chance Investment Group, LLC, 600 W. Santa Ana Blvd., PMB 5045, Santa Ana, CA 92701-4558

TOTAL: 1

**Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.**  
Electronic transmission includes sending notices via email (Email/text and Email/PDF), and electronic data interchange (EDI).

NONE

## BYPASSED RECIPIENTS

The following addresses were not sent this bankruptcy notice due to an undeliverable address, \*duplicate of an address listed above, \*P duplicate of a preferred address, or ## out of date forwarding orders with USPS.

Recip ID	Bypass Reason	Name and Address
intp	*+	2nd Chance Investment Group, LLC, 600 W. Santa Ana Blvd., PMB 5045, Santa Ana, CA 92701-4558

TOTAL: 0 Undeliverable, 1 Duplicate, 0 Out of date forwarding address

## NOTICE CERTIFICATION

I, Gustava Winters, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

**Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed .R. Bank. P.2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.**

Date: Mar 12, 2025

Signature: /s/Gustava Winters

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## CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on March 10, 2025 at the address(es) listed below:

Name	Email Address
Adam N Barasch	on behalf of Defendant Ford Motor Credit Company LLC anb@severson.com, cr@severson.com
Amanda G. Billyard	on behalf of Debtor 2nd Chance Investment Group LLC abillyard@bwlawcenter.com
Andrew Michael Cummings	on behalf of Defendant NBCUniversal Media LLC andrew.cummings@hklaw.com philip.dobbs@hklaw.com;hapi@hklaw.com;sandy.olalde@hklaw.com
Andrew Michael Cummings	on behalf of Defendant NBCUniversal LLC andrew.cummings@hklaw.com

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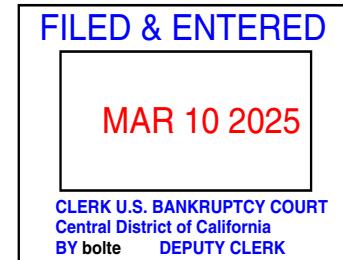
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United States Trustee (SA)

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TOTAL: 70



UNITED STATES BANKRUPTCY COURT  
CENTRAL DISTRICT OF CALIFORNIA  
SANTA ANA DIVISION

In re: Case No.: 8:22-bk-12142-SC  
2nd Chance Investment Group, LLC, CHAPTER 11  
  
Debtor(s). ORDER RE (1) CLOTEE DOWNING'S  
OMNIBUS MOTION FOR APPOINTMENT OF  
PRO BONO COUNSEL PER FRCP RULE  
17(C)(2), AND FOR RELIEF FROM ORDER  
AUTHORIZING SALE OF REAL PROPERTY  
(DOC 313) UNDER FRCP RULE 60(b)(2), (3),  
(4) and/or (6), OR IN THE ALTERNATIVE,  
(d)(3) [DK. 445]; and (2) CLOTEE  
DOWNING'S EX PARTE MOTION TO  
CONTINUE HEARING TO AUGUST 2025,  
AND TO IMMEDIATELY APPOINT  
COUNSEL [DK. 467]  
  
Vacated Hearing:  
Date: March 12, 2025  
Time: 1:30 PM  
Courtroom: 5C

The Court, having considered Clotee Downing's Omnibus Motion For  
Appointment of Pro Bono Counsel Per FRCP Rule 17(C)(2), and For Relief From Order  
Authorizing Sale of Real Property (Doc 313) Under FRCP Rule 60(B)(2), (3), (4) And/Or

1 (6), Or In The Alternative, (D)(3) filed November 20, 2024 [Dk. 445] ("Reconsideration  
2 Motion"), Clotee Downing's Ex Parte Motion To Continue Hearing To August 2025, And  
3 To Immediately Appoint Counsel filed February 19, 2025 [Dk. 467] ("Motion to  
4 Continue") (collectively, Motions), all relevant pleadings, the docket as whole, and for  
5 the reasons stated below, finds good cause to DENY the Reconsideration Motion,  
6 DENY the Motion to Continue as it is moot, and VACATE the March 12, 2025 hearing.

7 Geoff Trapp ("Mr. Trapp") signed and filed the Reconsideration Motion and  
8 Motion to Continue as "An Incompetent Person Without a Representative, suing by her  
9 Next Friend Geoff Trapp as permitted by FRCP Rule 17(c)(2)." Mr. Trapp, however, has  
10 failed to provide evidence that he is authorized and legally permitted to represent Ms.  
11 Downing before this Court. As previously noted by the Court, his representation of Ms.  
12 Downing, without counsel, constitutes the unauthorized practice of the law by Mr.  
13 Trapp.<sup>1</sup> Dk. 328; See e.g., *Schmitz v. Asman*, 2024 U.S. Dist. LEXIS 101796, at \*9  
14 (E.D. Cal. June 7, 2024), vacated on other grounds ("a non-attorney guardian ad litem  
15 must have counsel in order to litigate a case"). While Mr. Trapp has not been appointed  
16 a next friend, a guardian ad litem, or a conservator, even if he had been, as a non-  
17 attorney, he is not permitted to practice law on behalf of others. *Berrios v. N.Y.C. Hous. Auth.*,  
18 564 F.3d 130, 134 (2d Cir. 2009) ("If the representative of the minor or  
19 incompetent person is not himself an attorney, he must be represented by an attorney in  
20 order to conduct the litigation.").

21 Further, Mr. Trapp's reliance on FRCP 17 is misplaced. FRBP 7017, in relevant  
22 part, makes FRCP 17 applicable in adversary proceedings. The Motions, however, are  
23 filed in the main case, not in an adversary proceeding, and so FRCP 17 is inapplicable.  
24 Additionally, FRCP 17 pertains to the appointment of a next friend or guardian ad litem,

25  
26 <sup>1</sup> In an order entered December 5, 2023 [Dk. 329], this Court previously noted that Mr. Trapp's  
27 presentation of motions before the Court constituted the unauthorized practice of law. Further, the Court  
28 notes that an appeal filed in adversary 8:24-ap-01105 was dismissed by the United States Bankruptcy  
Appellate Panel of the Ninth Circuit as Mr. Trapp failed to timely respond to the BAP Clerk's Order  
requiring Mr. Trapp to file a response explaining in what capacity he was representing Clotee Downing in  
the appeal and what authority authorized him to prosecute an appeal on Clotee Downing's behalf. Adv.  
8:24-ap-01105, Dk. 45.

1 not the appointment of counsel. FRCP 17(c)(2); *Tackett v. United States HHS*, 2021  
2 U.S. Dist. LEXIS 251119, at \*4 (D. Mont. May 7, 2021). Therefore, Mr. Trapp's request  
3 for counsel to be appointed is denied.

4 Accordingly, the Court finds good cause to order as follows:

- 5 1. The Reconsideration Motion is DENIED.
- 6 2. Geoff Trapp's request for the appointment of counsel is DENIED.
- 7 3. The Motion to Continue is DENIED.
- 8 4. The March 12, 2025 hearing is VACATED.
- 9 5. Geoff Trapp is cautioned that any further pleadings filed by him personally,  
10 without counsel, on behalf of Clotee Downing may result in the Court issuing  
11 an order to show cause as to why such pleadings should not be rejected for  
12 the unauthorized practice of law.

13 **IT IS SO ORDERED.**

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24 Date: March 10, 2025

  
25 Scott C. Clarkson  
26 United States Bankruptcy Judge  
27  
28

1                   **NOTICE OF ENTERED ORDER AND SERVICE LIST**

2                   Notice is given by the court that a judgment or order entitled (*specify*) **ORDER RE (1) CLOTEE**  
3                   **DOWNING'S OMNIBUS MOTION FOR APPOINTMENT OF PRO BONO COUNSEL**  
4                   **PER FRCP RULE 17(C)(2), AND FOR RELIEF FROM ORDER AUTHORIZING SALE**  
5                   **OF REAL PROPERTY (DOC 313) UNDER FRCP RULE 60(b)(2), (3), (4) and/or (6),**  
6                   **OR IN THE ALTERNATIVE, (d)(3) [DK. 445]; and (2) CLOTEE DOWNING'S EX**  
7                   **PARTE MOTION TO CONTINUE HEARING TO AUGUST 2025, AND TO**  
8                   **IMMEDIATELY APPOINT COUNSEL [DK. 467]** was entered on the date listed above and will  
9                   be served in the manner indicated below:

10                  **I. SERVED BY THE COURT VIA U.S. MAIL:** A copy of this notice and a true copy of this judgment or  
11                  order was sent by U.S. Mail, first class, postage prepaid, to the following person(s) and/or entity(ies) at  
12                  the address(es) indicated below:

13                  Clotee Downing  
14                  2551 East Avenue S, Suite G-166  
15                  Palmdale, CA 93550

16                  Geoff Trapp  
17                  2551 East Avenue S, Suite G-166  
18                  Palmdale, CA 93550